

# **Exhibit B**

David J. Richards

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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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Case No. 02:04-cv-793

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DRFP, LLC, d/b/a Skye Ventures,  
Plaintiff,

vs.

The Republican Bolivariana De Venezuela,  
et al.,

Defendants.

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Video

Deposition of: DAVID J. RICHARDS

Date and Time: Monday, December 22, 2014  
9:09 a.m.

Place: Calfee, Halter & Griswold  
1200 Huntington Center  
41 South High Street  
Columbus, Ohio

Reporter: Julieanna Hennebert, RPR, RMR  
Notary Public - State of Ohio

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25 Also Present:  
Mr. Gil Whitney, Videographer.  
--|--

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1 Monday Morning Session,  
2 December 22, 2014.  
3 --|--  
4 VIDEOGRAPHER: We're on the record. This  
5 is the videotaped deposition of David Richards in the  
6 matter of DRFP, LLC, doing business as Skye Ventures,  
7 versus the Republican Bolivariana De Venezuela, et  
8 al., being heard before the U.S. District Court,  
9 Southern District of Ohio.  
10 This deposition is being held at 41 South  
11 High Street, Columbus, Ohio, on December 22, 2014, at  
12 9:09 a.m.  
13 My name's Gil Whitney and I'm the  
14 videographer; the court is Julie Hennebert.  
15 Counsel, will you please introduce  
16 yourself and your affiliations.  
17 MR. ELLIOTT: Rex Elliott and Adam  
18 Richards on behalf of the plaintiff, appearing with  
19 Dave Richards, the witness.  
20 MR. SCHWARTZ: We'll each identify  
21 ourselves. Andrew Schwartz, Foley Hoag, LLP, for the  
22 defendants.  
23 MR. BALDWIN: Richard Baldwin, Foley Hoag,  
24 for the defendants.  
25 MR. LUCAS: And I'm Albert Lucas from

1 (Pages 1 to 4)

<p style="text-align: right;">Page 33</p> <p>1 was writing to the Ministry of Finance and saying</p> <p>2 we're diligencing the Attorney General's opinion and</p> <p>3 if there's anything wrong with it, please let me</p> <p>4 know, kind of like that, and that was November 2nd</p> <p>5 of or 3rd of 2003.</p> <p>6 Q. Excuse me for a second. That's an email</p> <p>7 from John Kennedy to whom?</p> <p>8 A. John Kennedy at Crabbe-Brown.</p> <p>9 Q. Yeah, to whom?</p> <p>10 A. To the Ministry of Finance, it's one or</p> <p>11 two people at the Ministry of Finance.</p> <p>12 Q. Do you recall which two?</p> <p>13 A. No, I don't. But it didn't recall me</p> <p>14 specifically but reminded me of kind of what we were</p> <p>15 doing back then and sort of the flow of things. I</p> <p>16 was apparently copied on the email so wasn't a record</p> <p>17 that I'd had.</p> <p>18 So that was something that sticks out in</p> <p>19 my mind as seeing that thing and, boy, I didn't</p> <p>20 remember that. And what did we do right before and</p> <p>21 right after that.</p> <p>22 Then if I'm going to kind of go forward</p> <p>23 there and think of the things that I saw, of course I</p> <p>24 reviewed the agreements, the whole -- I went through</p> <p>25 all the agreements and tried to resolve in my mind</p>	<p style="text-align: right;">Page 35</p> <p>1 And kind of their thought processes and</p> <p>2 going back and forth with them that caused me to</p> <p>3 remember kind of the bases we were trying to cover</p> <p>4 then and all of that.</p> <p>5 So I'd say the things that popped to my</p> <p>6 head as you asked that question are those.</p> <p>7 Q. What note were you trying to sell in the</p> <p>8 U.S. financial system in the fall of 2004?</p> <p>9 A. Note 9/12.</p> <p>10 Q. Where did you get the various documents</p> <p>11 that you reviewed for purposes of preparing for these</p> <p>12 depositions?</p> <p>13 A. From my counsel.</p> <p>14 Q. As far as you're aware were all of the</p> <p>15 documents that you reviewed documents that had been</p> <p>16 produced to the defendants in this case?</p> <p>17 A. I have no idea. Either Chip or Rex can</p> <p>18 answer that.</p> <p>19 Q. When you practiced law, what kind of work</p> <p>20 did you do?</p> <p>21 A. For the first five or six years I was a</p> <p>22 litigator, maybe seven, and for the last couple years</p> <p>23 I was a tax guy.</p> <p>24 Q. Why did you make that change?</p> <p>25 A. Well, you want to know the real truth?</p>
<p style="text-align: right;">Page 34</p> <p>1 all of the back and forth that was going on with</p> <p>2 those agreements and all of the negotiations and</p> <p>3 remonstrations to finally get to where we were.</p> <p>4 And so the agreements helped and more in</p> <p>5 that sense of not so much looking at the exact legal</p> <p>6 terms but kind of what was going on and what was</p> <p>7 happening in consecutive order in this timeframe up</p> <p>8 to the lawsuit being filed.</p> <p>9 I reviewed -- the thing that really helped</p> <p>10 me was when in the fall of 2004 we took out a -- we</p> <p>11 were doing a transaction on behalf of Gruppo to try</p> <p>12 and sell one of the notes in sort of the U.S.</p> <p>13 financial system and we put together a short</p> <p>14 memorandum to, not to offer the bonds but the term of</p> <p>15 interest. And so reading that helped me think about</p> <p>16 kind of what our mental processes were at the time</p> <p>17 and what we thought and helped me reflect back on how</p> <p>18 we got to those opinions.</p> <p>19 And I saw a -- I saw a document that was</p> <p>20 prepared by Jess Ravich at Libra Securities, and</p> <p>21 Libra -- Jess was an ex-managing partner at Kidder</p> <p>22 Peabody, and so I remember all that back and forth</p> <p>23 that started I think in June of '04 with him, because</p> <p>24 he's very, very powerful -- or, not powerful but kind</p> <p>25 of a big guy. He's far above my level.</p>	<p style="text-align: right;">Page 36</p> <p>1 I'm under oath. Well, I looked around in Columbus</p> <p>2 and every litigator I thought was really good was</p> <p>3 either divorced, an alcoholic, or something, and I</p> <p>4 was starting a family and I decided I wanted a</p> <p>5 different life.</p> <p>6 So I thought maybe tax would provide that</p> <p>7 and I went to the Capital master's in tax program,</p> <p>8 which I almost finished but got sick of that too, I</p> <p>9 mean, tax, pretty bad for a litigator, right? So and</p> <p>10 then I went to business.</p> <p>11 Q. How long were you at Crabbe, Brown &amp;</p> <p>12 James?</p> <p>13 A. I was active there from I think '77 to '85</p> <p>14 or '6 and then completely gone in '88 or somewhere</p> <p>15 around there.</p> <p>16 Q. Was that the last law firm you worked at?</p> <p>17 A. That's the only law firm I worked at. I</p> <p>18 was a partner there.</p> <p>19 Q. Did you leave voluntarily?</p> <p>20 A. Over their objection, yeah.</p> <p>21 Q. Now, at some point you formed the entity</p> <p>22 that's now known as Skye Ventures, LLC, right?</p> <p>23 A. Yes.</p> <p>24 Q. When was that?</p> <p>25 A. Well, it started out as a blank entity</p>

<p style="text-align: right;">Page 37</p> <p>1 called I think DRFP, LLC I believe, and that was in 2 August of 2003.</p> <p>3 <b>Q.</b> And you also had formed an entity in the 4 same timeframe called Empire Advisors, LLC; is that 5 right?</p> <p>6 <b>A.</b> I don't know when that was, to be honest 7 with you. But probably was in the same timeframe. 8 Empire was related to another business that, well, 9 Empire was sort of a -- we formed that, I formed that 10 as a sort of an umbrella entity and it would hold 11 entities typically like DRFP or others. So as to 12 exactly when Empire was started, I don't know.</p> <p>13 Empire involved sort of the same group of 14 investors, high-net-worth individuals that had been 15 with me since '90. So it was more of a -- nothing 16 discontinuous. So there was no event that makes me 17 remember when it was.</p> <p>18 <b>MR. SCHWARTZ:</b> Let's take a 19 couple-of-minute break here.</p> <p>20 <b>VIDEOGRAPHER:</b> Off the record 9:56. 21 (Recess taken.) 22 <b>VIDEOGRAPHER:</b> On the record 10:05.</p> <p>23 <b>Q.</b> We were talking about the formation of 24 Empire Advisors, LLC when we took a break and you 25 described it as an umbrella that would hold entities</p>	<p style="text-align: right;">Page 39</p> <p>1 going to make reference to "Skye" from time to time. 2 You'll understand when I do that that I'm referring 3 to the plaintiff Skye Ventures, LLC which was 4 formerly known as DRFP, LLC, right?</p> <p>5 <b>A.</b> We have, Empire has three or four entities 6 that are called Skye something, so I sometimes get 7 confused, but I know today if we're talking about 8 Skye, it will be Skye Ventures, that's the Bandagro 9 bonds holder.</p> <p>10 <b>Q.</b> Or Skye, just so we're -- 11 <b>A.</b> Or Skye. 12 <b>Q.</b> Now, there's also an entity known as 13 Skye II, right? 14 <b>A.</b> Yes. 15 <b>Q.</b> What is that? 16 <b>A.</b> I think Skye II is an entity that we 17 formed in connection with note 9/12. We viewed it as 18 a separate transaction and I think we formed a 19 separate entity for that. I believe that's how that 20 came about.</p> <p>21 <b>Q.</b> Which entity today owns note 9/12? 22 <b>A.</b> I don't know the answer to that question. 23 I would assume it's Skye II but it might have 24 transferred to Skye. I don't know. 25 <b>Q.</b> How could you figure out an answer to that</p>
<p style="text-align: right;">Page 38</p> <p>1 like DRFP, LLC. I don't want to spend a lot of time 2 on this, but what's the relationship between Empire 3 and DRFP, LLC, which is now known as Skye Ventures, 4 LLC? If there is one.</p> <p>5 <b>A.</b> Well, this is maybe too technical for me, 6 but I would guess that Empire owns a hundred percent 7 of Skye maybe. Is that right? We typically own all 8 or part of the entities that are group funds.</p> <p>9 <b>Q.</b> I don't know if it's right, I have to ask 10 you those questions.</p> <p>11 <b>A.</b> I don't either. I don't know. We've got 12 a million entities so it's hard for me to know the 13 details of any one of them.</p> <p>14 <b>Q.</b> Let me just pause for a second and get 15 some nomenclature understanding here with you. So 16 the plaintiff in this case is called Skye Ventures, 17 LLC, right?</p> <p>18 <b>A.</b> Yes. 19 <b>Q.</b> And it was formerly known as DRFP, LLC, 20 right? 21 <b>A.</b> Yes. 22 <b>Q.</b> Those are one and the same. 23 <b>A.</b> I believe so, yes. I'm sure of it. 24 <b>Q.</b> So during the course of the deposition I'm 25 going to make reference to "Skye Ventures" or I'm</p>	<p style="text-align: right;">Page 40</p> <p>1 question?</p> <p>2 <b>A.</b> Well, I could do another records 3 search and try to figure it out and it would be the 4 same, I would have to -- that's what I'd have to do, 5 I'd have to go figure it out and look at it.</p> <p>6 <b>Q.</b> If you don't know, who would know? 7 <b>A.</b> Well it would only be me, I would know, 8 right? And would I have to go back and look and see 9 if it was still Skye II or what.</p> <p>10 <b>Q.</b> Is that something you could take on as a 11 homework project for tomorrow? 12 <b>A.</b> You better start writing these down.</p> <p>13 <b>MR. ELLIOTT:</b> We'll consider it. Can you 14 tell me, though, why it would be important to you to 15 know which entity holds note 9/12?</p> <p>16 <b>MR. SCHWARTZ:</b> Not without revealing the 17 mental impressions of your adverse counsel.</p> <p>18 <b>MR. ELLIOTT:</b> Okay. 19 <b>MR. SCHWARTZ:</b> But it is part of the 20 overall factual mix and we do want to know which 21 entity owns note 9/12. We particularly want to know 22 if the plaintiff owns it. But I don't consider this 23 to be the single most important issue in the case or 24 in the deposition. 25 <b>MR. ELLIOTT:</b> We'll talk about it.</p>

10 (Pages 37 to 40)

<p style="text-align: right;">Page 57</p> <p>1 now, I use Empire for everything.</p> <p>2 Q. And what's your email address at Empire?</p> <p>3 A. DRichards@EmpireAdvisorsLLC.com.</p> <p>4 Q. When was the Skye Ventures server</p> <p>5 operational?</p> <p>6 A. Well, I don't know. I had a fellow that</p> <p>7 did that, he died. I don't remember exactly when all</p> <p>8 that happened.</p> <p>9 Q. Who was that fellow?</p> <p>10 A. His name was Eric Jones.</p> <p>11 Q. To the best of your recollection when did</p> <p>12 you cease using an email address at SkyeVentures.com?</p> <p>13 A. To be honest with you, I don't know how</p> <p>14 long that hung around. I really, honestly, I have a</p> <p>15 lot of email addresses, so I just don't remember.</p> <p>16 Q. Back in 2003 and 2004 what email address</p> <p>17 did you use for Skye Ventures' business?</p> <p>18 A. I think that's when we used Skye Ventures'</p> <p>19 email I believe. Maybe not until -- maybe it wasn't</p> <p>20 2003, maybe as it became a real active transaction we</p> <p>21 did something with that. So maybe probably more</p> <p>22 likely 2004 we started with that.</p> <p>23 Q. In that timeframe did you send emails to</p> <p>24 Mr. Pavanelli?</p> <p>25 A. In 2004, yeah, I'm sure I did, yeah.</p>	<p style="text-align: right;">Page 59</p> <p>1 A. Probably some of the people on this list</p> <p>2 in 2004.</p> <p>3 Q. Some of the investors.</p> <p>4 A. Yeah, probably.</p> <p>5 Q. Did you communicate with Mr. Jacir, that's</p> <p>6 J-a-c-i-r, by email in 2004?</p> <p>7 A. I was copied on some emails by Jacir but</p> <p>8 those were all Alcalde. Jacir does not speak</p> <p>9 English, so.</p> <p>10 Q. So you were copied on emails from Jacir to</p> <p>11 Alcalde that were sent in Spanish?</p> <p>12 A. Once or twice, yeah. They were almost all</p> <p>13 in Spanish. I don't believe Miguel speaks any</p> <p>14 English at all.</p> <p>15 Q. Did Schianchi -- does Schianchi speak</p> <p>16 English?</p> <p>17 A. I'm not sure how much he speaks or doesn't</p> <p>18 speak. But when I've interacted with him, I've</p> <p>19 always had an interpreter.</p> <p>20 Q. And Pavanelli spoke English though,</p> <p>21 correct?</p> <p>22 A. Yeah. He spoke English well.</p> <p>23 Q. Do you have copies of the emails that you</p> <p>24 sent to any of these investors in which you solicited</p> <p>25 their investment in the Bandagro notes?</p>
<p style="text-align: right;">Page 58</p> <p>1 Q. And in that same timeframe, 2004, did you</p> <p>2 send emails to Mr. Schianchi?</p> <p>3 A. I'm sure I did. Schianchi, he pronounces</p> <p>4 it ski-ahn-ki.</p> <p>5 Q. So that's S-c-h-i-a-n-c-h-i.</p> <p>6 A. You would pronounce my wife's name</p> <p>7 cas-si-ot-ti if you read it not cash-shotti, so they</p> <p>8 get offended by that.</p> <p>9 Q. In 2004 did you send emails to anybody</p> <p>10 else concerning the Bandagro notes?</p> <p>11 A. I'm sure I did.</p> <p>12 Q. To whom else?</p> <p>13 A. Well, we talked about Pavanelli and</p> <p>14 Schianchi, certainly my attorneys.</p> <p>15 Q. Who were active as your attorneys at that</p> <p>16 point?</p> <p>17 A. Crabbe-Brown.</p> <p>18 Q. Who at Crabbe-Brown?</p> <p>19 A. Most of the work was being done by Luis</p> <p>20 Alcalde, John Kennedy some, and Jeff Brown, and there</p> <p>21 were a couple others who worked on it. I dealt</p> <p>22 mostly with Alcalde.</p> <p>23 Q. So you sent emails in 2004 to Schianchi,</p> <p>24 to Pavanelli, to Alcalde, to John Kennedy, to Jeff</p> <p>25 Brown, anybody else? Concerning Bandagro.</p>	<p style="text-align: right;">Page 60</p> <p>1 A. No.</p> <p>2 Q. Where are they?</p> <p>3 A. I don't have any emails from back then at</p> <p>4 all.</p> <p>5 Q. What happened to them?</p> <p>6 A. God knows. It's ten computers and who</p> <p>7 knows. You might remember back then, you know,</p> <p>8 Outlook only had small storage too. Today I</p> <p>9 currently I have 50,000 emails in my In box but back</p> <p>10 then that wasn't the case. So I don't have any. My</p> <p>11 oldest email is about 2009. I'd have to look.</p> <p>12 Q. Let me ask you about a few people who are</p> <p>13 on this list at the end of Exhibit 2.</p> <p>14 A. Okay.</p> <p>15 Q. About 55 percent of the way down on the</p> <p>16 left-hand column there's somebody named Gary Post.</p> <p>17 Do you see him?</p> <p>18 A. Yes.</p> <p>19 Q. Who's he?</p> <p>20 A. Gary is a financial guy from LA. He owns</p> <p>21 a firm called Ambient Campo Capital. He's an</p> <p>22 ex-Drexel-Burnham guy.</p> <p>23 Q. How much has he invested?</p> <p>24 A. I don't know.</p> <p>25 Q. Who is Jim Douglas? He's about 80 percent</p>

<p style="text-align: right;">Page 61</p> <p>1 of the way down the left-hand column.</p> <p>2 A. Jim Douglas is a guy who owns a restaurant</p> <p>3 in town here, a guy I play golf with.</p> <p>4 Q. Looking over at the right-hand column, who</p> <p>5 is Michael Strick?</p> <p>6 A. Mike Strick is the fellow who owns the</p> <p>7 big PR firm in LA.</p> <p>8 Q. How much has he invested?</p> <p>9 A. I don't know.</p> <p>10 Q. Three from the bottom on the right-hand</p> <p>11 column is John Kennedy. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Is that the same John Kennedy from</p> <p>14 Crabbe-Brown?</p> <p>15 A. Yes.</p> <p>16 Q. How much has he invested?</p> <p>17 A. I don't know.</p> <p>18 Q. And just looking at the last two names,</p> <p>19 you have Adam Richards and Chip Cooper from Cooper &amp;</p> <p>20 Elliott, with a paren (as attorney). Is that meant</p> <p>21 to indicate they're just recipients of the</p> <p>22 communications as attorneys as opposed to investors?</p> <p>23 MR. ELLIOTT: We created the list and</p> <p>24 that's what it was intended to convey.</p> <p>25 A. Yeah, I think there are several people on</p>	<p style="text-align: right;">Page 63</p> <p>1 asked him about what. And he said well, just talk to</p> <p>2 him for five minutes.</p> <p>3 So as a favor to Dave who had done me a</p> <p>4 lot of favors in life, I agreed to meet with Larry.</p> <p>5 And Larry came over to my house, I was at my home</p> <p>6 that day, came over right within the hour.</p> <p>7 Q. In Ohio?</p> <p>8 A. In Ohio, right, my Ohio home. Knocked on</p> <p>9 the front door, and I don't know exactly when it was</p> <p>10 but I remember it was very, very hot, and Larry was</p> <p>11 there in a business dress shirt and sweating. It was</p> <p>12 must have been a hundred degrees. So I think it was</p> <p>13 late August or September.</p> <p>14 And so I stood on the doorstep and talked</p> <p>15 to him a little bit, and he was talking about this</p> <p>16 bond deal that I should be interested in. And well,</p> <p>17 I said to him, well, you know, if there's -- you're</p> <p>18 standing on the doorstep of my house, I'm not going</p> <p>19 to talk to you about a bond deal.</p> <p>20 Well, what it really was, that Larry</p> <p>21 wanted \$5,000. So, and he was going to give me some</p> <p>22 interest in this deal that he was describing and the</p> <p>23 way he was talking about it, maybe I wasn't focused,</p> <p>24 but didn't make a lot of sense.</p> <p>25 So I said look, I'll loan you 5,000 bucks,</p>
<p style="text-align: right;">Page 62</p> <p>1 here that may get the communications that aren't</p> <p>2 actual monetary investors, and certainly Adam and</p> <p>3 Chip are two of those.</p> <p>4 Q. Are not monetary investors?</p> <p>5 A. Are two of those who were not monetary</p> <p>6 investors, yes.</p> <p>7 Q. Understood.</p> <p>8 When did you first become acquainted with</p> <p>9 Pavanelli?</p> <p>10 A. I believe it was in October of 2003.</p> <p>11 Although it's possible I spoke to him in September.</p> <p>12 Q. How is it that you came to be in contact</p> <p>13 with him?</p> <p>14 A. We were looking at the transaction and he</p> <p>15 was the acting officer of the people who owned the</p> <p>16 notes.</p> <p>17 Q. How did you find out about this</p> <p>18 opportunity?</p> <p>19 A. Well, it's an odd story, like about half</p> <p>20 of my deals. So what happened was there was a fellow</p> <p>21 in town named Dave Corna and Dave was a pretty good</p> <p>22 friend, or at least a pretty good business friend and</p> <p>23 had done a number of things with him in the past, and</p> <p>24 he called me and asked me if I would talk to his</p> <p>25 brother, Larry Corna, who I had never met. And I</p>	<p style="text-align: right;">Page 64</p> <p>1 which I did. I went inside, got a check, wrote him a</p> <p>2 \$5,000 check. And said that I could talk to him</p> <p>3 about the deal later. And he said he'd give me an</p> <p>4 interest in this deal and pay me back.</p> <p>5 So there are a lot of Cornas in town, I</p> <p>6 know Richie's a big builder, fellow member at</p> <p>7 Muirfield, Mark's also a big construction guy and</p> <p>8 president of banks, and I assumed I could trust a</p> <p>9 Corna for 5 grand, so I wrote him a check and he</p> <p>10 left.</p> <p>11 And then maybe a week after that or two I</p> <p>12 had a phone conversation with him about the deal and</p> <p>13 he started telling me the story about the Bandagro</p> <p>14 bond deal.</p> <p>15 Q. This was a phone conversation with Larry?</p> <p>16 A. With Larry. And that he was going to get</p> <p>17 me papers on the deal and, you know, make sure that</p> <p>18 my \$5,000 was good. And he might even have asked me</p> <p>19 for another 5 at the time, I'm not sure about that.</p> <p>20 So I asked him how he got this deal and</p> <p>21 where he heard of it, and he told me that it was sent</p> <p>22 to him, so he told me some story about how it was</p> <p>23 back in Italy where his family was from and then came</p> <p>24 through a local fellow named Marvin Cantor and he</p> <p>25 mentioned Antonio Uselli's name, told me a little</p>

<p style="text-align: right;">Page 153</p> <p>1 A. Yeah.</p> <p>2 Q. What did you mean when you said in the</p> <p>3 website "Skye's ownership interest is held through</p> <p>4 Gruppo Triad FFC, S.P.A."?</p> <p>5 A. That makes it clear, I was referring to</p> <p>6 these deeds of trust that we own. Now I see that.</p> <p>7 Q. The website screen shot goes on to say</p> <p>8 that the materials available on a certain point of</p> <p>9 the site include detailed documentation including</p> <p>10 opinion of counsel. You see that?</p> <p>11 A. Yes.</p> <p>12 Q. Which opinion of counsel was available on</p> <p>13 the website as of March of 2004?</p> <p>14 A. I don't know.</p> <p>15 Q. Was it is an opinion of Crabbe, Brown &amp;</p> <p>16 James?</p> <p>17 A. I don't know.</p> <p>18 Q. Was it an opinion from some Venezuelan</p> <p>19 counsel?</p> <p>20 A. Again, I don't remember which opinion of</p> <p>21 counsel it was.</p> <p>22 Q. Has Skye Ventures or any affiliated person</p> <p>23 or entity engaged Venezuelan counsel for any reason</p> <p>24 having to do with the Bandagro notes?</p> <p>25 A. I've engaged a couple of lawyers in</p>	<p style="text-align: right;">Page 155</p> <p>1 remember.</p> <p>2 Q. This screen shot indicates that available</p> <p>3 on the site was "Correct information on Gruppo Triad</p> <p>4 and its owners." Do you recall what information was</p> <p>5 available?</p> <p>6 A. Nope.</p> <p>7 Q. Do you recall if there were multiple</p> <p>8 owners as to which information was provided?</p> <p>9 A. Nope.</p> <p>10 Q. Then it goes to say "Skye is also</p> <p>11 interested in purchasing Bandagro notes which are</p> <p>12 authentic."</p> <p>13 Do you see that?</p> <p>14 A. Uh-huh.</p> <p>15 Q. You need to answer --</p> <p>16 A. Sorry. Yes.</p> <p>17 Q. -- verbally.</p> <p>18 At that time, March 2004, was Skye looking</p> <p>19 to obtain Bandagro notes from sources other than</p> <p>20 Gruppo Triad?</p> <p>21 A. Well, you know, we'd be interested to know</p> <p>22 if other people out there were claiming that they had</p> <p>23 authentic Bandagro notes. And, yeah, maybe we're</p> <p>24 interested in purchasing.</p> <p>25 Q. Did you have reason to think at that time</p>
<p style="text-align: right;">Page 154</p> <p>1 Venezuela, not at that time. If this is truly from</p> <p>2 March of '04, again, which I don't know or not, but I</p> <p>3 engaged Venezuelan counsel for various reasons, but</p> <p>4 by then, I mean, guys like Bedell who filed</p> <p>5 affidavits in this case and Duque-Corredor, and then</p> <p>6 I spoke -- I've spoken to a raft of Venezuelan</p> <p>7 attorneys but I don't think any were ever retained by</p> <p>8 me.</p> <p>9 Q. How many have you paid?</p> <p>10 A. How many have I paid.</p> <p>11 Q. Or has Skye Ventures paid. Or has any</p> <p>12 affiliated entity paid for this purpose.</p> <p>13 A. So paid Corredor, paid Bedell for their</p> <p>14 work. I believe I paid a small payment to one of the</p> <p>15 big firms there, I think Baker &amp; Hostetler.</p> <p>16 Q. What for?</p> <p>17 A. We wanted their opinion as to whether the</p> <p>18 decision was final and binding. But we ended up</p> <p>19 not -- they wanted too much money so we didn't go</p> <p>20 through with them. But they did say it was final and</p> <p>21 binding. It wasn't Baker, it was one of the -- they</p> <p>22 had an outlet here in Columbus too. Might have been</p> <p>23 Baker.</p> <p>24 Q. Were there any others you've paid?</p> <p>25 A. No, I don't think so. Not that I can</p>	<p style="text-align: right;">Page 156</p> <p>1 that there were people out there who had Bandagro</p> <p>2 notes which were not authentic?</p> <p>3 A. I think, well, the Attorney General said</p> <p>4 in their opinion there are notes out there which are</p> <p>5 false and notes which are authentic. And so we</p> <p>6 assumed there were.</p> <p>7 Q. Let's mark Exhibit 11.</p> <p>8 (RICHARDS/SKYE EXHIBIT 11 WAS MARKED.)</p> <p>9 Q. Mr. Richards, I'm showing you Exhibit 11,</p> <p>10 it's a two-page letter from you to Mr. Pavanelli,</p> <p>11 dated March 18, 2004. Please review it and let me</p> <p>12 know if you recognize it.</p> <p>13 A. Yes. Okay, I remember this. I haven't</p> <p>14 seen this before, so.</p> <p>15 Q. Well, when you say you haven't seen it</p> <p>16 before, looks like it's a letter you wrote and signed</p> <p>17 and sent to Mr. Pavanelli by fax on March 18, 2004,</p> <p>18 right?</p> <p>19 A. Excuse me, it's not signed by me. There's</p> <p>20 a signature stamp. I'm not saying I'm not the author</p> <p>21 of the letter, but that's a stamp. And what I was</p> <p>22 not saying is that I didn't do this, I just said I</p> <p>23 didn't review this in preparation for this</p> <p>24 deposition. I haven't seen it I guess since 2004.</p> <p>25 Q. You did send this letter to Mr. Pavanelli</p>



<p style="text-align: right;">Page 177</p> <p>1 impressive place, and waited around for about 45</p> <p>2 minutes after our meeting was supposed to start. Sat</p> <p>3 with a guy and had a conversation for about half an</p> <p>4 hour or 45 minutes, and I left and went back home,</p> <p>5 back to Ohio.</p> <p>6 <b>Q.</b> How did you come to learn that they hated</p> <p>7 Pavanelli?</p> <p>8 <b>A.</b> That's what my -- the guy who arranged the</p> <p>9 meeting said that the purpose was to -- they thought</p> <p>10 Pavanelli was an irrational or crazy guy and the</p> <p>11 purpose was to show them -- I guess they had</p> <p>12 conversations, so the purpose was to show them that</p> <p>13 oh, no, this guy is a reasonable fellow.</p> <p>14 <b>Q.</b> Did you ever hear further from any of</p> <p>15 these people about this subject?</p> <p>16 <b>A.</b> Well, I know that nothing really ever came</p> <p>17 of it specific. But I'm sure we had conversations</p> <p>18 afterwards.</p> <p>19 <b>Q.</b> So if Alex was the only other guy in the</p> <p>20 meeting who spoke English, did he act in effect as an</p> <p>21 intermediary to communicate to Mr. Tovar and the</p> <p>22 congressman?</p> <p>23 <b>A.</b> Yes.</p> <p>24 <b>Q.</b> Who was with you if anyone when you met</p> <p>25 with Jacir in April of '04?</p>	<p style="text-align: right;">Page 179</p> <p>1 met at his office, and then we drove to his home and</p> <p>2 we met there.</p> <p>3 I'd say that I think we met in his office</p> <p>4 the evening or day before and then we went to his</p> <p>5 house, and the session at his house was, I'll bet it</p> <p>6 was 11 hours long. And we broke a couple of times</p> <p>7 and but I think from start to finish it was about 11</p> <p>8 hours, 12 hours. It was a long day.</p> <p>9 <b>Q.</b> How long did you spend in his office the</p> <p>10 evening or the day before?</p> <p>11 <b>A.</b> I think it was a couple hours.</p> <p>12 <b>Q.</b> And this was -- all this conversation took</p> <p>13 place between Alcalde and Jacir in Spanish and you</p> <p>14 sat there for the 13 hours?</p> <p>15 <b>A.</b> Well, I kind of -- his wife Sandra can</p> <p>16 talk a little bit of English and I kind of wandered</p> <p>17 outside the office and spoke to her a little bit,</p> <p>18 then there was a meal a little bit. And occasionally</p> <p>19 I'd be saying what's he saying, what's he saying kind</p> <p>20 of thing. But that as the extent of it.</p> <p>21 I was more seeing what did Jacir look</p> <p>22 like, did he seem like a reasonable guy, you know,</p> <p>23 that kind of stuff. That body language, that kind of</p> <p>24 thing.</p> <p>25 <b>Q.</b> Beyond body language and talking to his</p>
<p style="text-align: right;">Page 178</p> <p>1 <b>A.</b> Alcalde.</p> <p>2 <b>Q.</b> What was the purpose of that meeting?</p> <p>3 <b>A.</b> Well, from Alcalde's standpoint, Luis</p> <p>4 wanted to meet with Jacir. Jacir, we didn't know he</p> <p>5 had Parkinson's at the time but we knew that on phone</p> <p>6 calls he was very difficult to understand. And while</p> <p>7 he would think that you were understanding what he</p> <p>8 was saying, it was difficult for Alcalde.</p> <p>9 In fact, if you were trying to ask Alcalde</p> <p>10 listening to him and to get him to ask questions, he</p> <p>11 would be shooing you off because he was straining so</p> <p>12 hard to hear what Jacir was saying.</p> <p>13 So from Alcalde's point of view was to go</p> <p>14 and sit in a room with Jacir and get sort of the full</p> <p>15 story and background and history of everything that</p> <p>16 Jacir had done and what he knew and all of that.</p> <p>17 From my point of view I, again, it was all</p> <p>18 in Spanish, I was just looking at body language and</p> <p>19 the situation and trying to gather what I could</p> <p>20 gather from the surroundings and what else was going</p> <p>21 on.</p> <p>22 <b>Q.</b> How long did that meeting last?</p> <p>23 <b>A.</b> It was very long. I was actually amazed</p> <p>24 that Jacir could last that long because he was</p> <p>25 clearly frail. So we met in two places. First, we</p>	<p style="text-align: right;">Page 180</p> <p>1 wife and the meals, if I wanted to find out what type</p> <p>2 of substantive information was conveyed by Jacir</p> <p>3 during that 13-hour event, I'd have to talk to</p> <p>4 Alcalde or Jacir, correct?</p> <p>5 <b>A.</b> If you wanted any meaningful, because</p> <p>6 again, I would ask questions and say what's he</p> <p>7 saying. But Alcalde was the one that was going back</p> <p>8 and forth, back and forth, and I would only interrupt</p> <p>9 once every 45 minutes or so.</p> <p>10 <b>Q.</b> So I'd have to talk to Alcalde or talk to</p> <p>11 Jacir or both.</p> <p>12 <b>A.</b> Yeah, I'd say Alcalde or Jacir. Probably</p> <p>13 Jacir.</p> <p>14 <b>Q.</b> Are you still on good terms with Alcalde?</p> <p>15 <b>A.</b> Sure.</p> <p>16 <b>Q.</b> Does he have any residual interest in the</p> <p>17 outcome of this case?</p> <p>18 <b>A.</b> I don't think so. You'd have to talk to</p> <p>19 his law firm about that.</p> <p>20 <b>Q.</b> All right, so we were going to talk about</p> <p>21 the meeting you had with Woodstrite but I took you on</p> <p>22 two different excursions so we're going to get back</p> <p>23 to that.</p> <p>24 When did you first learn that Woodstrite</p> <p>25 was claiming a 25 percent interest in the notes No. 7</p>



<p style="text-align: right;">Page 193</p> <p>1 Q. Does Uselli have any interest in the</p> <p>2 outcome of this litigation?</p> <p>3 A. I believe I'm pretty sure he has an</p> <p>4 interest in, you know, in Gruppo's notes. And should</p> <p>5 Gruppo get paid on on their promissory note from</p> <p>6 litigation, he may be entitled to some -- I think he</p> <p>7 is entitled to some of those proceeds.</p> <p>8 Q. Are you saying that he has an interest in</p> <p>9 the portion of the proceeds that Gruppo would get if</p> <p>10 Skye prevails and collects in this case?</p> <p>11 A. Correct, yes.</p> <p>12 Q. So you described this very long pair of</p> <p>13 meetings that you had with Alcalde and Jacir in April</p> <p>14 '04. I want to make sure I've got an understanding</p> <p>15 of how many other times you've met with Jacir. So</p> <p>16 I'll start by asking have you ever met with Jacir</p> <p>17 other than that time?</p> <p>18 A. Yes.</p> <p>19 Q. On how many occasions?</p> <p>20 A. One.</p> <p>21 Q. When was that?</p> <p>22 A. June of '04.</p> <p>23 Q. Where was that?</p> <p>24 A. At his home in Miami.</p> <p>25 Q. Again, this was before you purchased notes</p>	<p style="text-align: right;">Page 195</p> <p>1 the purpose of meeting Jacir?</p> <p>2 A. Yes.</p> <p>3 Q. As with the meeting that took place in</p> <p>4 April with Jacir, was the meeting conducted in</p> <p>5 Spanish?</p> <p>6 A. Yes.</p> <p>7 Q. Without going through this in quite as</p> <p>8 methodical a manner we did with the regard to the</p> <p>9 April meeting, was it more or less the same</p> <p>10 experience with you?</p> <p>11 A. Yes. You know, I may have been -- if the</p> <p>12 meeting was more pointed, I might have asked a few</p> <p>13 more questions back and forth whereas in the first</p> <p>14 meeting I'd let them pretty much go because they were</p> <p>15 really going.</p> <p>16 Q. But for the most part this was a</p> <p>17 discussion conducted in Spanish between Alcalde and</p> <p>18 Jacir?</p> <p>19 A. Yes.</p> <p>20 Q. Did you get a download from Alcalde as to</p> <p>21 what Jacir had communicated after the meeting was</p> <p>22 over?</p> <p>23 A. I'm 100 percent sure I did. I just don't</p> <p>24 remember what it was.</p> <p>25 Q. Do you remember any of it?</p>
<p style="text-align: right;">Page 194</p> <p>1 7 of 12 and 8 of 12?</p> <p>2 A. Yes.</p> <p>3 Q. Where does he live in Miami? Or did he</p> <p>4 live I should say.</p> <p>5 A. Pardon me?</p> <p>6 Q. Where did he live in Miami at that time?</p> <p>7 A. It was a bit south of Fort Lauderdale and</p> <p>8 a bit north of Miami Beach. And I forget the name of</p> <p>9 the community. It was on the water.</p> <p>10 Q. What was the purpose of that meeting?</p> <p>11 A. I think it was just part of this</p> <p>12 continuing attempt to gather information, getting</p> <p>13 everything we could. I'm sure there was specific</p> <p>14 reasons for the meeting but I can't remember exactly</p> <p>15 what they were.</p> <p>16 Q. Who else attended this meeting?</p> <p>17 A. Alcalde, obviously Jacir, Sandra. She was</p> <p>18 helping, I mean, he was really frail then and she was</p> <p>19 there to make sure he was okay and comforted and she</p> <p>20 would help with the translations and what he said.</p> <p>21 So she was active. And then one of the sons both of</p> <p>22 whom I'd met in Caracas. I forget the son's name.</p> <p>23 Q. How long did this meeting last?</p> <p>24 A. I think it was an entire day.</p> <p>25 Q. Did you travel to Florida specifically for</p>	<p style="text-align: right;">Page 196</p> <p>1 A. As it relates to actually what he said</p> <p>2 after that meeting, no. I mean, it just comes into</p> <p>3 this larger thing of all the information was gathered</p> <p>4 from when we started to when we bought the notes.</p> <p>5 Q. Was there any discussion at the meeting</p> <p>6 with Jacir in June about Woodstrite?</p> <p>7 A. Possibly.</p> <p>8 Q. Was there any discussion at that meeting</p> <p>9 about Woodstrite losing its action in the Venezuelan</p> <p>10 Supreme Court?</p> <p>11 A. Possibly, but I don't know.</p> <p>12 Q. We'll revisit that issue if and when you</p> <p>13 are successful in refreshing your recollection, as</p> <p>14 you've indicated you'll attempt do?</p> <p>15 A. I'll do my best.</p> <p>16 Q. At some point did you learn that the</p> <p>17 Ministry of Finance of Venezuela issued a report in</p> <p>18 November '03 saying in substance that the Gruppo</p> <p>19 Triad notes were fakes and should not be paid?</p> <p>20 A. No.</p> <p>21 Q. Have you ever learned that to this day?</p> <p>22 A. I don't know that that happened. That's</p> <p>23 not what I understand happened.</p> <p>24 Q. Have you -- do you have any understanding</p> <p>25 of there being some report issued by the Ministry of</p>

David J. Richards

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1 But I do remember that we did meet with them at this  
 2 hotel, which I think was the Marriott in Caracas.  
 3 Q. And was that the last time you  
 4 communicated in any way directly or indirectly with  
 5 Oscar Guzman Cova?  
 6 A. Yes.  
 7 Q. To the best of your knowledge has Alcalde  
 8 ever communicated any further with Oscar Guzman Cova?  
 9 A. He may have but I don't know.  
 10 Q. Do you have any information as to whether  
 11 Oscar Guzman Cova had any ongoing interactions with  
 12 Jacir after this meeting?  
 13 A. I remember he said he was really scared  
 14 and he was clearly kind of fidgety about being there,  
 15 he was scared, he didn't want to be involved, he was  
 16 afraid for him or his family or something. And I  
 17 think he just melted into the background after that.  
 18 Q. Guzman Cova.  
 19 A. Yeah. I don't think he wanted to be  
 20 there.  
 21 Q. Have you ever learned in any way, shape,  
 22 or form that he had any financial interest in the  
 23 outcome of the situation involving any of these  
 24 notes?  
 25 A. No.

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1 today, gentlemen. We've more or less used seven  
 2 hours; is that correct?  
 3 MR. ELLIOTT: Yep.  
 4 MR. BALDWIN: About ten minutes to spare.  
 5 MR. SCHWARTZ: Thank you for hanging in  
 6 there today, we'll see you tomorrow.  
 7 THE WITNESS: Sounds good.  
 8 VIDEOGRAPHER: Off the record 5:20.  
 9 (Whereupon, at 5:20 p.m., the deposition  
 10 was concluded and signature was not waived.)  
 11 --|--

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1 Q. Has anyone ever suggested that to you?  
 2 A. No.  
 3 Q. How many further interactions did you have  
 4 with Delgado?  
 5 A. So Delgado was involved somewhat with the  
 6 sisters and some of those meetings. So I saw him  
 7 there. Delgado I think tried -- got involved with  
 8 some guys that owned the note and tried to -- came to  
 9 Columbus to talk about joining in our lawsuit and I  
 10 saw him then. And I saw him one other time in  
 11 Cincinnati with his attorney.  
 12 Q. Who was his attorney?  
 13 A. A fellow named Pierce Cunningham.  
 14 Q. He said he got involved with some guys who  
 15 owned the notes? Who did he get involved with?  
 16 A. I don't know. It was a name of a company  
 17 of Benespa but I don't really know who it was or what  
 18 his position was there. But that was supposedly the  
 19 owner of the notes. I don't know even know if they  
 20 owned the notes, to be honest with you. But they  
 21 said they did.  
 22 Q. Didn't they try to intervene in this  
 23 lawsuit at some point?  
 24 A. They might have.  
 25 MR. SCHWARTZ: I think that's enough for

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1 AFFIDAVIT  
 2 State of Ohio )  
 3 ) SS:  
 4 County of \_\_\_\_\_)  
 5 I, DAVID J. RICHARDS, do hereby certify that I  
 6 have read the foregoing transcript of my deposition  
 7 given on Monday, December 22, 2014; that together  
 8 with the correction page attached hereto noting  
 9 changes in form or substance, if any, it is true and  
 10 correct.  
 11  
 12  
 13  
 14

DAVID J. RICHARDS

9 I do hereby certify that the foregoing  
 10 transcript of the deposition of DAVID J. RICHARDS was  
 11 submitted to the witness for reading and signing;  
 12 that after he had stated to the undersigned Notary  
 13 Public that he had read and examined his deposition,  
 14 he signed the same in my presence on the \_\_\_\_\_ day  
 15 of \_\_\_\_\_, 2014.

Notary Public

16 My commission expires \_\_\_\_\_, \_\_\_\_\_.  
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David J. Richards

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CERTIFICATE

)  
State of Ohio )

) SS:

County of Franklin )

I, Julieanna Hennebert, RPR and RMR, the undersigned, a duly qualified and commissioned notary public within and for the State of Ohio, do certify that, before giving his deposition, DAVID J. RICHARDS was by me first duly sworn to testify to the truth, the whole truth, and nothing but the truth; that the foregoing is the deposition given at said time and place by DAVID J. RICHARDS; that I am neither a relative of nor employee of any of the parties or their counsel and have no interest whatever in the result of the action.

IN WITNESS WHEREOF, I hereunto set my hand and official seal of office on this 29th day of December, 2014.



Julieanna Hennebert, RPR, RMR,  
and Notary Public in and for the  
State of Ohio.

My commission expires February 19, 2018.  
(1134-JLH)

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**ERRATA SHEET****Deposition Date:** December 22, 2014**Case Name:** DRFP, LLC d.b.a Spe Ventures v. The Republica Bolivariana De Venezuela, et al.**Deponent:** David J. Richards

Page	Line	Now Reads	Should Read	Reason for Change
33	16	was apparently copied on the email so wasn't a record	was apparently copied on the email so it was a record...	Transcription Error
34	14	but the term of	but to determine the...	Transcription Error
37	1	called I think DRFP, LLC I believe	Called DelRio Family Partnership, LLC, ...	Correct error
42	6	...was the original owner of the notes.	was an owner of the notes prior to Skye.	Correct error
53	12	...is they're Culmini funds,....	...is they're money funds,...	Transcription Error
60	21	...called Ambient Campo Capital...	...called Ambient Capital...	Transcription Error
67	12	...it was interest in a...	..if it was an interest in a...	Transcription Error
70	4	...if he were a stranger,...	...he was not a stranger,...	Transcription Error
87	17	was a bastard kind of turning...	was a master at turning...	Transcription Error
108	8	It did a bunch of stuff	We did a bunch of stuff.	Transcription Error
110	10	April 1st is my wife's birthday	April 2nd is my wife's birthday	Correct error
111	25	a small line	a small line of credit	Transcription Error
116	17	wasn't	was	Transcription Error
120	14	Yes.	I learned that Pavanelli had been charged with handling false notes and some sort of conspiracy charge. I learned that Pavanelli was acquitted of the charge related to handling false instruments; however, I also learned that he was convicted of a conspiracy charge unrelated to Skye's Notes.	Misunderstood question
120	25	I don't remember	I don't remember when I learned Pavanelli was acquitted of the charge related to handling false instruments and convicted of a conspiracy charge unrelated to Skye's Notes.	Clarification due to change above

124 - 125	23- 3	In other words, I felt that these are bearer instruments that are valid or invalid. And if the guy who had them was an angel and they weren't valid, didn't matter. If the guy that had them was not an angel and they had it, didn't matter.	In other words, I felt that these are bearer instruments that are valid or invalid. And if the guy who had them was an angel and the instruments weren't valid, it didn't matter because the notes were invalid. If the guy that had them was not an angel and they were valid, didn't matter because the notes were valid.	Transcription Error; clarification
127	6	wasn't true.	wasn't true. Pavanelli did not have a Bandagro note on his computer that he was filling out.	Clarification
154	4	Bedell	Badell	Transcription Error
154	13	Bedell	Badell	Transcription Error
159 -160	25- 1	Yeah. And my memory. Which is slightly different but probably wrong.	No.	Documents have been produced evidencing dates of trip
163	12	....he took an interest in the notes.	he took a right to receive a distribution interest from the proceeds Skye received from the notes	Clarification
183	14	12	12 and 8 of 12	Transcription Error
183	16	of 12	of 12 and 8 of 12	Transcription Error
245	24	I'm pretty sure the answer to that is yes.	Yes	Clarification
255	21	Bedell, Yvonne Bedell...	Badell, Ivan Badell	Transcription Error (Note that change should be made throughout transcript)
256	17	Bedell	Badell	Transcription Error
256	22	Bedell	Badell	Transcription Error
257	10	Bedell	Badell	Transcription Error
257	11	Pretty sure, yes. In writing.	Yes.	Clarification; Documents have been produced evidencing dates of trip

262	11	Bedell	Badell	Transcription Error
270	17	Chava Gato. Chava...	Csaba Kato. Csaba....	Transcription Error
270	23	....Chava Gato.	....Csaba Kato.	Transcription Error
271	2	....Chava was pretty close to Chavez	....Csaba was pretty close to Chavez	Transcription Error
276	25	Well, it was Chava but I forget exactly	Well, it was Csaba but I forget exactly	Transcription Error

2-16-2015

\_\_\_\_\_  
Date

/s/

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David J. Richards, Deponent

